

SPACE-LOK INC.

SFUND RECORDS CTR
2166-02439

May 24, 1990

Hank H. Yacoub
Supervising Water Resource Control Engineer
California Regional Water Quality Control Board
Los Angeles Region
101 Centre Plaza Drive
Monterey Park, California 91754-2156

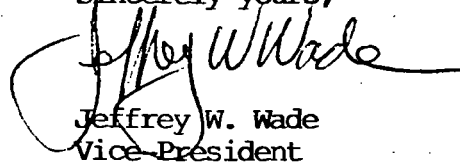
Re: Space-Lok Facility Located at
2526 North Ontario Street
Burbank, California
Your File No. 104.0986

Dear Sir:

In response to your letter of March 22, 1990, our attorneys have asked Dean O. Gregg P.E., R.G. of Environmental Science & Engineering, Inc. to review and comment upon the need for and utility of a ground water investigation at the Space-Lok facility. A copy of Mr. Gregg's report is enclosed. As you can see, Mr. Gregg has concluded that, based on results of soil sampling, "there is no logical nor technically justifiable reason to conduct a ground-water investigation at this site" and that, because "water quality information at Space-Lok would be valueless to differentiate, identify, and qualify any contributions from Space-Lok."

At your convenience, and after you have had an opportunity to review Mr. Gregg's report, Mr. Gregg and I would be happy to meet with you and discuss the situation further.

Sincerely yours,



Jeffrey W. Wade
Vice President

Encl;

cc: Alisa Greene, U.S.E.P.A., Region IX
Bill Jones, Los Angeles County, Dept. of Health Services
Thyamagondalu, City of Burbank, Industrial Waste Dept.
Margot A. Metzner, Hufstedler, Miller, Kaus & Beardsley



Environmental
Science &
Engineering, Inc.

17 May 1990

Hufstedler, Miller, Kaus & Beardsley
355 South Grand Avenue, 45th Floor
Los Angeles, California 90071-3107
Attention: Ms. Margot A. Metzner

**SUBJECT: SPACE-LOK FACILITY LOCATED AT 2526 NORTH ONTARIO STREET
IN BURBANK, CALIFORNIA**

**REFERENCE: 1-Phase I Report "Preliminary Subsurface Exploration",
Converse Environmental Consultants California,
8 April 1988
2-Phase II Report "Final Report, Clarifier Inspection
and Subsurface Soil Investigation", Carberry and
Associates, 29 November 1989
3-California Regional Water Quality Control Board
letter, 21 March 1990**

Dear Ms. Metzner:

Environmental Science & Engineering, Inc. (ESE) has been retained as an independent third party technical consultant for the Space-Lok facility located at 2526 North Ontario Street in Burbank, California. ESE professional personnel have completed a site walk and reviewed Phase I and Phase II investigative reports and a letter from the California Regional Water Quality Control Board, Los Angeles Region (CRWQCB).

Results of the Phase I and II investigations indicate that low concentrations of halogenated chemical compounds (PCE and TCA) used at the subject facility exist in the near-surface soil at several locations on site. Low concentrations of petroleum hydrocarbons, including components of gasoline (benzene, toluene, ethylbenzene and xylenes) were also detected in soil below this facility. No gasoline has been stored or used at this facility; although, there is a hazardous waste storage area on the adjacent property to the east that may be contributing to the chemical compounds detected at the subject property. A summary of the investigative findings and chemical test results are attached.

Recent studies in the site vicinity indicate that ground water is flowing in a south-southeasterly direction at approximately 165 feet below grade.

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Ms. M. A. Metzner
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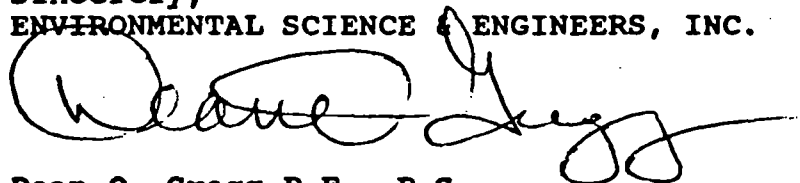
The near-surface soils containing PCE and TCA should be remediated. Since neither of these compounds were detected in soil below 10 feet (sampled to 60 feet), there is no reason to expect that these compounds have migrated to ground water at 165 feet below grade. Petroleum hydrocarbons compounds (benzene, toluene, ethylbenzene and xylenes), possibly from gasoline, detected at this site may have been generated from an off-site source. A record search of the suspect property to the east should be conducted to verify this possibility. It is unlikely that any hydrocarbon compounds found at shallow depth to 40 feet have or will migrate an additional 120 feet to ground water.

In this part of the San Fernando Valley, coarse-grained sediments predominate in the upper 100 feet and become finer grained with depth. The finer-grained sediments inhibit and retard the migration of contaminants with depth. The fact that no halogenated chemicals were found below 10 feet in areas where surface soils contained such chemicals and that no petroleum hydrocarbon compounds were found below 40 feet indicates that the compounds had rapidly attenuated to nondetectable concentrations in the upper coarse-grained soils. Further, there is virtually no possibility that any of these compounds could have migrated through the finer-grained sediments to the ground water at 165 feet. Thus, there is no logical nor technically justifiable reason to conduct a ground-water investigation at this site.

A ground-water monitoring well was installed by others about 200 feet upgradient from the Space-Lok site. This well reportedly contains some of the worst ground water in the San Fernando Valley with extremely high concentrations of halogenated organics and other chemicals. This same water passes beneath the Space-Lok site. High background concentrations in ground water would mask any possible contributions from Space-Lok. Thus, water quality information at Space-Lok would be valueless to differentiate, identify, and qualify any contributions from Space-Lok.

If you have any questions concerning this material, please contact the undersigned at (714) 964-8722.

Sincerely,
ENVIRONMENTAL SCIENCE & ENGINEERS, INC.



Dean O. Gregg P.E., R.G.
Principal Hydrogeologist, Senior Vice President

Attachment

INVESTIGATIVE SUMMARY

Results of the Phase I investigation were submitted on 8 April 1988 by Converse Environmental Consultants California. This investigation consisted of four soil borings advanced to a maximum depth of 12 feet below grade (BG) in two areas of potential environmental concern as designated by the CRWQCB. The Phase II investigative results were submitted on 29 November 1989 by Carberry and Associates. This investigation consisted of four soil borings advanced to a maximum depth of 60 feet BG. The boring locations were picked under the direct supervision of the CRWQCB. Three of the four borings were in areas of potential environmental concern.

Recent studies in the site vicinity indicate that ground water is flowing in a south-southeasterly direction at approximately 165 feet below grade.

Based on the results of the subsurface soils investigation, it appears that the halogenated volatile organic (HVO) compounds detected at this site are from near surface discharge. These compounds have been used at the subject facility. The low concentrations (tetrachloroethene [PCE], 0.48 to 14 milligrams per kilogram (mg/kg) and 1,1,1 trichloroethane [TCA], 0.0088 to 0.48 mg/kg) relative to the depth to ground water, approximately 165 feet BG, do not warrant a ground-water investigation. Analyses of soil samples from Borings DB-1, DB-2, and DB-3 showed that there were no halogenated organics below 5 feet of depth to the bottom of the boring at 60 feet. Analyses of soil samples from Boring SB-1 showed that there were no halogenated organics below 10 feet of depth to the bottom of the boring at 40 feet. This indicates that it is extremely unlikely that halogenated hydrocarbons at near-surface have impacted the ground water. A more detailed discussion of the analytical results follows.

Low concentrations of petroleum hydrocarbons were detected at this site. No gasoline has been stored at this facility. The maximum concentrations of benzene, toluene, ethylbenzene, and total xylenes were 0.45, 1.24, 0.42 and 2.88 mg/kg, respectively. Again, relative to the depth to ground water (165 feet) these low concentrations do not warrant a ground-water investigation. EPA Method 418.1 is used for detection of the high viscosity heavier end members of the hydrocarbon chain. The low concentrations of TPH (maximum 35 mg/kg) detected in the soils collected below this site also should have no impact to the ground water. These concentrations are below the normal acceptable levels allowed to remain in soil under similar conditions. The presence of these petroleum hydrocarbons is suspect because there is no trail from the surface to the depth where they were detected. This high viscosity material should leave a trail even in coarse-grained soils.

In conclusion, there is no logical nor technical reason to conduct a ground-water investigation at this site. The low concentrations of HVOs, BTEXs and TPHs; the depth to ground water (165 feet BG); and the fact that no halogenated chemicals were detected below 10 feet and no petroleum hydrocarbon compounds were detected below 40 feet do not substantiate the need for a ground-water investigation. Further, there is a ground-water monitoring well approximately 200 feet up-gradient from the Space-Lok facility that has reportedly some of the highest concentrations of HVOs in the San Fernando Valley. In the unlikely event that some organic chemicals have migrated to ground water, it is not reasonable to expect that a ground-water well at the Space-Lok facility would enable one to differentiate an on-site source from that of an up-gradient source. There is also a hazardous waste storage area located on the property east of the Space-Lok facility that may be contributing to the chemical compounds detected on the subject site.

CHEMICAL RESULTS OF SOIL SAMPLES

HALOGENATED VOLATILE ORGANICS

Chemical analyses indicate that halogenated volatile organic (HVO) compounds attenuated to Not Detected between 10 and 15 feet below grade (BG) in soil samples from seven borings drilled at this site.

During the Phase I investigation, analytical results from soil samples collected adjacent to the chemical storage shed indicated tetrachloroethene (PCE) levels up to 14 milligrams per kilogram (mg/kg) at 6 inches BG; however, PCE had attenuated to Not Detected at 5 feet BG (Boring BH-4). PCE concentrations were 0.13 mg/kg at 6 inches and 0.053 mg/kg at 5 feet BG in Boring BH-2. PCE had attenuated to Not Detected in this boring at 7.5 feet BG. No soil samples were recovered from Boring BH-3. During Phase II, no HVO compounds were detected in soil samples collected from 5 to 60 feet BG (total depth) in the soil boring (DB-2) located adjacent to the chemical storage shed.

Analytical results from Phase I soil samples collected adjacent to the vapor degreaser indicated PCE concentrations of 3.2 and 1.1 mg/kg at 6 inches and at 5 feet BG (Boring BH-1). No PCE was detected in the soil sample taken at 12 feet BG. The only HVOs detected in soil samples from this area during Phase II were 0.25 mg/kg of PCE at 5 feet BG (Boring DB-3). No HVOs were detected from 10 to 60 feet BG (total depth).

Chemical analyses indicated 0.097 mg/kg PCE and 0.075 mg/kg TCA at 5 feet BG in the soil north of the Header Building (Boring DB-1). No HVO compounds were detected in soil samples from 10 to 60 feet

BG (total depth).

Soil samples collected from the boring (Boring SB-1) adjacent to the clarifier indicated no HVOs at 5 feet BG but 0.48 mg/kg PCE and 0.0088 mg/kg 1,1,1 trichloroethane (TCA) at 10 feet BG. No HVOs were detected in soil samples from 15, 20, 25, 30, 35 and 40 feet BG (total depth) in Boring SB-1.

PETROLEUM HYDROCARBON COMPOUNDS

No Phase I soil samples were analyzed for petroleum hydrocarbons. All analytical results of tests for petroleum hydrocarbons were recorded in the Phase II report. Chemical analyses indicated that low concentrations of petroleum hydrocarbons are present in the subsurface below this site.

Soil samples collected (Boring DB-2) adjacent to the Chemical Storage Shed indicated that no petroleum hydrocarbons were present from surface to 60 feet BG.

No benzene (B) was detected in the soil samples collected from Boring DB-3 adjacent to the vapor degreaser. Toluene, ethylbenzene, and total xylenes (T,E, and X) were detected in a soil sample at 20 feet BG at concentrations of 1.24, 0.42 and 2.88 mg/kg, respectively. Total xylenes were also detected in a soil sample at 25 feet BG at 0.06 mg/kg. None of these constituents were detected in soil samples from 25 to 60 feet BG. Very low levels of total petroleum hydrocarbons (TPH) were detected in soil samples at 10 and at 50 feet BG using EPA Method 418.1 for heavy end hydrocarbon members. These concentrations were only 35 and 20 mg/kg, respectively.

Low concentrations of benzene were detected in soil samples collected at 5, 10, 15, and 20 feet BG adjacent to the Header Building (Boring DB-1). The highest level detected was 0.45 mg/kg at 10 feet BG. The remaining levels ranged from 0.30 to 0.35 mg/kg. Toluene, ethylbenzene, and total xylenes were also detected at 5 to 20 feet BG with the highest concentrations at 0.75, 0.09, and 0.70 mg/kg, respectively. Toluene, ethylbenzene, and total xylenes were also detected at 40 feet BG. Their concentrations were 0.55, 0.15 and 1.17, respectively. All other soil samples collected to 60 feet BG contained Not Detected concentrations. Low levels (10 mg/kg) of TPH were detected in soil samples collected at 15 feet BG and analyzed using EPA Method 418.1 for heavy end hydrocarbon members.

No benzene, toluene, ethylbenzene or total xylenes were detected in soil samples collected adjacent to the clarifier (Boring SB-1). Soil samples from 5 and 10 feet BG were analyzed for these compounds.